

Permit Spl
Cond**COMMENTS ON COMPLIANCE w/EA. PERMIT SPL CONDITION**

1	Eqmt OK, but Note: EUFORG-PICKLE & associated equip physically removed from service Dec 2001
2	HAP limits=per discussions w/DEQ inspector Dave Morgan during site inspection Monday 30 Aug 1999, the HAP's of concern by AQD for monitoring & records are only HCl & Lead Compounds, not the entire list of HAP's. Permit Limitation only, no records req'd, but see Sht TOTAL HAPS, Column W, X & Z
3	PM-10 is tracked, see Sht PM-10, column S; last entry
4	NOx 89.9 tpy on 12mo rolling ave, see Sht Nat Gas Use & NOx, column H
5	Calc HAP individual & aggregate by production month = See Sht TOTAL HAPS, Columns S,T,& U
6	Calc total PM-10 by prod month = Sht PM-10, Column P
7	Calc total NOx by prod month = Sht NAT GAS USE & NOx, Column E
8	Records Total amt fuel combusted by calendar month = Sht NAT GAS USE & NOx, Column C
9	B-Baghouse, PM emission, 1.0 lbs/hr, 4.38 tpy on 12 month rolling period = Permit does not req records, exists as "limitation" only, however, see Sht PM-TOTAL, Column N
10	B-Baghouse must be installed & operating properly, no records req'd
11	B-Baghouse must have press drop indicator, it does, no records req'd
12	B-Baghouse press drop must be btw 4.0-12.0 inches WC, it is, no records req'd
13	B-Baghouse Stacks, 10 ea, 21"dia, = or >50'agl, 2 sks per module, all compliant, no records req'd
14	Billet Heaters run on Natural Gas only, they do, no records req'd
15	Billet Ht#1 disch = 22'agl w/32"dia, it is, no records req'd
16	Billet Ht#2 disch = 22'agl w/32"dia, it is, no records req'd
17	Billet Ht#3 disch = 22'agl w/32"dia, it is, no records req'd
18	C-Baghouse PM emissions, 1.0 #/hr, 4.38 ton per 12 mo rolling period, Limitation only not a record reqm't, but see Sht PM-TOTAL, Column Q
19	C-Baghouse must be installed & operating properly, it is, no records req'd
20	C-Baghouse must have press drop indicator, it does, no records req'd
21	C-Baghouse press drop must be btw 4.0-12.0 inches WC, it is, no records req'd
22	C-Baghouse disch 16 louvered vents, 2'x2-1/2' 2 sks per module, @=or > 28'agl, all compliant, no records req'd
23	A-Baghouse, PM emission, 1.0 lbs/hr, 4.38 tpy on 12 month rolling period = Permit does not req records, exists as "limitation" only, however, see Sht PM-TOTAL, Column K
24	A-Baghouse must be installed & operating properly, no records req'd
25	A-Baghouse must have press drop indicator, it does, no records req'd
26	A-Baghouse press drop must be btw 4.0-12.0 inches WC, it is, no records req'd
27	A-Baghouse Stacks, 10 ea, 21"dia, = or >50'agl, 2 sks per module, all compliant, no records req'd
28	PM emission from Chip Dryers = or < 0.10 lbs/1000 lbs exhaust gas, calcs in application, permit limitation only, no records req'd
29	R-Dryer PM emissions 2.4 lb/hr, 10.6 tpy on 12mo rolling pd, limitation only, no calc/records req'd, but see Sht PM-TOTAL, Column U & X
30	A-Dryer PM emission 2.7lb/hr, 11.8tpy on 12mo rolling pd, permit limitation only, no calc or records req'd, but see Sht PM-TOTAL, Columns AB & AE
31	Chip Dryer HCl emission 8.7tpy on 12mo rolling pd, no calc or records req'd, but see Sht HAP-HCL, Column Q
32	R-Dryer to operate w/wet scrubber installed & operating properly, it is compliance, no records req'd
33	A-Dryer operate w/cyclone, thermal oxidizer, quench & baghouse installed & oper properly, it is compliance during operation, no records req'd
34	A-Dryer operate w/ave temp 1500 deg F & 1.5 sec maintained, it is during operation so is compliance, no records req'd
35	A-Dryer eqpt'd w/press drop on baghouse & afterburner gauge installed, they are installed and operate properly during operations, no records req'd.
36	R-Dryer disch 67'agl w/30" dia, compliance, no records req'd
37	A-Dryer process disch 61'agl w/24"dia, compliant, no records req'd
38	A-Dryer combustion disch 55'agl w/36" dia, compliant, no records req'd
39	Chip Dryers feeds to stop if bypassed, compliant, no records req'd; also no by-pass provision
40	Cleaning Line, Forging Nitric Acid emission 40 milligrams & 0.3 lb/hr, limitation only, no records req'd, removed
41	Cleaning Line, Forging HCl emissions 3.3 milligrams, 0.03 lb/hr, limitation only, no records req'd.
42	Cleaning Line, Scrubber to be installed & oper properly before operations, compliant, no records req'd
43	Cleaning Line Scrubber pressure drop btw 2-4.5"WC, compliant, no records req'd
44	Cleaning Line, Pickle, vat 5,6,&7 disch 55agl w/14" dia, compliant during operation, no records req'd

45	Cleaning Line, Pickle, vats 1,2,4,8,9 & 10 disch 52agl w/24"dia, compliant during oper, no records req'd
46	Cleaning Line, Pickle, vat 3, caustic, disch 39'agl w/18"dia, compliant during oper, no records req'd
47	Cleaning Line, Pickle, press drop reading recorded on scrubber, compliant, records kept in Forging, H.Ferguson (5yrs record retention from unit shut down expires Dec 2006)
48	Sludge Dryer, no visible emission, compliant, no records req'd
49	Sludge Dryer, PM emissions 1.0tpy on 12mo rolling period, permit limitation only, no records req'd, but see Sht PM-SLUDGE DRYER, Column F & I
50	Sludge Dryer operate w/wet scrubber installed & oper proper, compliant, no records req'd
51	Sludge Dryer Process disch 42'agl w/12"dia, compliant, no records req'd
52	Sludge Dryer Combustion exh disch 67'agl w/8"dia, compliant, no records req'd
53	Sludge Dryer no substitution of sludge type w/o notice to AQD, compliant, no records req'd
54	Sludge Dryer sludge moisture leaving no less than 55% by wt, analysis by request, compliant, no records req'd
55	Fuel only to be Natural Gas, compliant, no records req'd

NOTE: Thru out Oct into Jan 2004 we installed 2 wood burning space heater, exempt from Air Permitting by Rule 336.1282(b)(iii) exemption at web site <http://www.deq.state.mi.us/documents/deq-aqd-rules-apc-part2.pdf> (entered 16Dec03)